

**IN THE SUPERIOR COURT FOR THE  
STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
KENT COUNTY**

**SUPERIOR COURT**

**KENT, SC.**

**STATE OF RHODE ISLAND :**

**VS.**

**INDICTMENT NO.: K1-2019-0673A**

**JEFFREY T. BRITT,  
alias John Doe**

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**INDICTMENT**

The Statewide Grand Jury of the State of Rhode Island and Providence Plantations charges:

**Introduction**

At all times material to this Indictment:

1. Defendant JEFFREY T. BRITT operated Strategic Consulting Solutions, a political consulting firm.
2. Nicholas Mattiello (Mattiello) was a Democratic candidate for reelection as a State Representative from Cranston, Rhode Island in 2016.
3. Shawna Lawton (Lawton) was a Republican candidate for election as a State Representative from Cranston, Rhode Island in 2016.
4. Steven Frias (Frias) was a Republican candidate for election as a State Representative from Cranston, Rhode Island in 2016.
5. Donor 1 was an associate of defendant JEFFREY T. BRITT and provided services to defendant JEFFREY T. BRITT and/or Strategic Consulting Solutions in 2016.

6. On or about April 2016, the Fund for Democratic Leadership, a political action committee, retained defendant JEFFREY T. BRITT and Strategic Consulting Solutions to provide services for the political action committee and the reelection campaign of Mattiello.

7. Defendant JEFFREY T. BRITT and Strategic Consulting Solutions provided consulting and other services for the Fund for Democratic Leadership and the reelection campaign of Mattiello from on or about April 2016 through November 2016.

8. The Fund for Democratic Leadership and Mattiello's reelection campaign each made multiple payments to Strategic Consulting Solutions for services provided during the 2016 election campaign.

9. On September 13, 2016, Frias defeated Lawton in a Republican primary election.

10. Frias then went on to face and be defeated by Mattiello in the 2016 general election.

11. Political action committees, candidates and campaign organizations are subject to Rhode Island campaign finance reporting requirements as set forth in Chapter 25 of Title 17 of the Rhode Island General Laws, including the requirement to accurately report the identity of persons or entities making monetary contributions to the campaign or political action committee.

## COUNT 1

### **(Money Laundering – R.I. Gen. Laws § 11-9.1-15)**

12. The Grand Jury realleges and incorporates by reference paragraphs 1 through 11 of this Indictment.

13. On or about October 11, 2016, defendant JEFFREY T. BRITT met with Lawton at a location in Cranston, Rhode Island.

14. During that meeting, defendant JEFFREY T. BRITT and Lawton discussed the possibility of Lawton endorsing Mattiello in his general election race against Frias, to include Lawton sending a mailer to voters within Mattiello's State Representative district memorializing that endorsement.

15. Between on or about October 11, 2016 and October 19, 2016, defendant JEFFREY T. BRITT met with Lawton a second time, on this occasion at a location in Warwick, Rhode Island.

16. Defendant JEFFREY T. BRITT presented a mock-up of a proposed mailer to Lawton and the two discussed financing for the mailer, with defendant JEFFREY T. BRITT offering to assist Lawton with raising the money to pay for the mailer.

17. Defendant JEFFREY T. BRITT approached Donor 1 and asked him to contribute \$1000 to the Lawton's campaign.

18. Defendant JEFFREY T. BRITT delivered \$1000 in cash to Donor 1 at a location in Warwick, Rhode Island as reimbursement for that contribution.

19. On October 19, 2016, Donor 1 deposited \$1000 in cash into his checking account at Centreville Bank.

20. On or about October 19, 2016, Donor 1 wrote a check dated October 19, 2016 and payable to the campaign of Lawton from that same Centreville Bank checking account.

21. On or about October 20, 2016, defendant JEFFREY T. BRITT again met with Lawton at the same location in Warwick, RI.

22. Defendant JEFFREY T. BRITT delivered and caused to be delivered two checks, each in the amount of \$1000 to Lawton, representing them to be campaign contributions from two other individuals, one of which was the check from Donor 1.

23. Lawton provided defendant JEFFREY T. BRITT with a check drawn on her campaign account for \$2150 which was to be used to pay the cost of the mailer.

24. On October 20, 2016, Lawton deposited the two campaign contribution checks delivered to her by defendant JEFFREY T. BRITT into her campaign account.

25. Lawton subsequently reported the two \$1000 contributions to the Rhode Island Board of Elections on January 31, 2017, including listing the source of one of those contributions as Donor 1.

26. Wherefore, from on or about October 11, 2016, and continuing until at least on or about October 20, 2016, defendant JEFFREY T. BRITT did conduct a

financial transaction with the intent to avoid a transaction reporting requirement under state law, knowing that the transaction was designed in whole or in part to avoid a reporting transaction requirement under state law, in violation of R.I. Gen. Laws § 11-9.1-15(a).

**COUNT 2**


**(Prohibited Contributions – R.I. Gen. Laws § 17-25-12)**

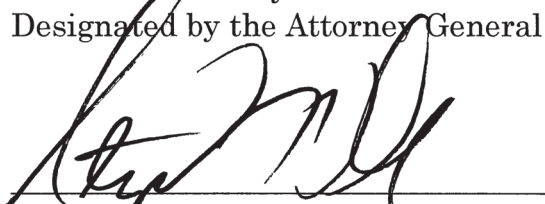
27. The Grand Jury realleges and incorporates by reference paragraphs 1 through 25 of this Indictment.

28. Wherefore, from on or about October 11, 2016, and continuing until at least October 20, 2016, defendant JEFFREY T. BRITT did knowingly contribute in the name of another to support a candidate in an election, in violation of R.I. Gen. Laws §§ 17-25-12 and 17-25-13.

PETER F. NERONHA  
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